

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION**

In re: )  
JAMES F. MCAULIFFE, ) CHAPTER 7  
Debtor. ) CASE NO. 16-11089-MSH  
JOHN O. DESMOND, CHAPTER 7 )  
TRUSTEE FOR THE ESTATE OF )  
JAMES F. MCAULIFFE )  
Plaintiff, ) ADVERSARY PROCEEDING  
v. ) NO. 16-01164-MSH  
ROBIN S. GILBERT, )  
Defendant. )

**JOINT MOTION TO AMEND THE DISCOVERY PLAN**

The plaintiff John O. Desmond, the duly appointed Chapter 7 Trustee (the “Trustee”) for the bankruptcy estate of James F. McAuliffe. (the “Debtor”) and the Defendant, Robin S. Gilbert (the “Defendant”) (collectively the “Parties”) hereby move to amend the Parties’ Court-approved Discovery Plan in this case for the purpose of extending all current deadlines set forth therein by sixty (60) days.

In support of this Motion, the Parties state as follows:

1. On March 28, 2016, the Debtor filed a voluntary petition pursuant to Chapter 7 of the Bankruptcy Code.
2. On March 29, 2016, the Trustee was appointed as the Chapter 7 trustee of the Debtor’s bankruptcy estate.